

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

S1 16 Cr. 506 (ALC)

Lacy Doyle

Defendant.

**AFFIDAVIT OF LACY DOYLE
IN SUPPORT OF LACY DOYLE'S PRETRIAL MOTIONS**

I, LACY DOYLE, under penalty of perjury pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the defendant in the above-captioned case.
2. Pursuant to search warrants issued on January 25, 2017 (the "Search Warrants"), federal law enforcement seized and searched email accounts and other electronic records (together the "Electronic Records") belonging to me and held at Google, Inc, Rackspace USA, Inc., and Yahoo!, Inc (the "Service Providers"). These search warrants are attached as Exhibits 77, 78, and 79 respectively to the Affirmation of Frederick P. Hafetz in Support of Lacy Doyle's Pre-trial Motions dated October 30, 2017 (Dkt. No. 66).

3. The Electronic Records held by the Service Providers and seized pursuant to the Search Warrants contain, at a bare minimum, my email correspondence. The Electronic Records also potentially contain calendars, records of internet searches, location data, records of correspondence and/or payment to the Service Providers, instant messages, chatroom records, stored online files, personal videos and pictures, lists of

personal and business contacts, and other electronic data. In short, the Search Warrants request from the Service Providers any online contact I have had through the Service Provider with any other person.

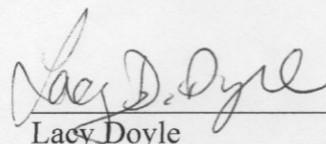
4. I am the owner and sole user of Electronic Records obtained pursuant to the Search Warrants.

5. My Electronic Records were password protected.

6. I had an expectation of privacy as to the Electronic Records.

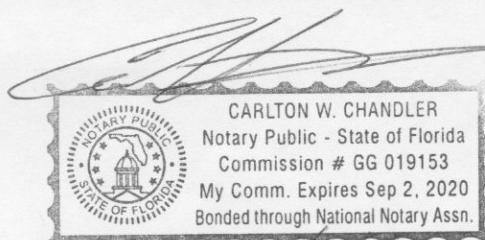
I declare under penalty of perjury that the foregoing is true and correct, pursuant to 28 U.S.C. § 1746.

Dated: January 4, 2018


Lacy Doyle

STATE OF FLORIDA:
COUNTY OF Palm Beach

Sworn to (or affirmed) and subscribed before me this 4 day of January 2018, by
Lacy Doyle.



Personally known _____ OR Produced Identification L 1/4/2018
Type of Identification
Produced NY Drivers License